

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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HOWARD HENRY,

Plaintiff,

-against-

Docket No.
05-CV-8106 (CMM)

PLAINTIFF'S PROPOSED
JURY QUESTIONS
FOR VOIR DIRE

WYETH PHARMACEUTICALS, INC.,
WALTER WARDROP, ANDREW
SCHASCHL, and MICHAEL
MCDERMOTT,

Defendants.

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Rather than reiterate the standard jury questions, which plaintiff is confident that the Court already plans on asking during jury selection, plaintiff submits the following brief list of additional jury questions, which we respectfully request be included during voir dire in this matter:

1. In your current or former employment, do (did) you ever supervise other employees? How many employees were under your supervision?
2. Given the fact that the defendants in this case were supervisors, who had and used supervisory authority, do you think that would cause you to lean towards the supervisors when evaluating this case?
3. Do you supervise other people? If you do please tell us about that. How many people do you supervise? What do they do? Do your supervisory responsibilities involve firing, hiring and disciplining or promoting people?
4. Does your job necessitate that you write performance evaluations or reviews for people? If yes, what kind of procedure do you follow? What is the purpose of the evaluation?
5. How is your job performance evaluated? Do you have some kind of evaluation or

review? How often? Is it oral or written? Are there any standards for evaluating your work?

6. Have you ever had any experience with a discrimination/harassment/retaliation claim, whether it was filed by you, against you or by someone in a company for which you worked? Tell us about it?
7. Have you or someone close to you ever felt that they were treated unfairly on the job? What were the circumstances? What did you or they do about it?
8. Have you or someone you know ever been in a situation where you felt like you were being forced out of a job? What were the circumstances?
9. Have you ever been in a situation where you felt like you have to put up with bad treatment? What kind of treatment was it? Why did you feel that you had to put up with it?
10. Does the term racist mean anything to you? What does it mean?
11. In the jobs you have had, have you ever had any duties or responsibilities pertaining to Human Resources, Personnel, or Labor Relations?
12. Have you ever owned your own business? If yes, how many employees did (do) you have? Did you ever terminate any of your employees? For what reasons?
13. Are or were you a member of any union or professional organization? If yes, please name all of the organizations to which you belong?
14. Do you feel that employees have a right to complain when they do not feel that their supervisors are not following laws, rules or regulations?

Dated: July 30, 2007
Carle Place, New York

Respectfully submitted,

LEEDS MORELLI & BROWN, P.C.
Attorneys for Plaintiff
One Old Country Road, Suite 347
Carle Place, New York 11514
(516) 873-9550

By: /s/
Steven A. Morelli, Of Counsel